



28 October 2020

Environment Canterbury
200 Tuam Street
PO Box 345
Christchurch 8140

Attention: Rubie McIntock

By email: Rubie.McIntock@ecan.govt.nz

Dear Rubie

Request for Further Information for CRC193563, CRC193564 and CRC193773

1. On behalf of SOL Quarries Ltd, I confirm receipt of the s92 Request for Further Information, dated 6th October 2020. Responses to the information requested is provided below. Please note that, for convenience, I have used the number contained in the s92 RFI.

Operation of the Crushing Plant

The proposal includes the operation of a crushing and screening plant on site. The application does not state how the crushing and screening plant will be powered. Please provide:

- a. *A description of how the crushing and screening plant is powered.*
 - b. *If powered by a generator, please provide, an assessment against the relevant rules of the Canterbury Air Regional Plan (CARP). If it is determined that a resource consent is required, please provide:*
 - i. *An assessment of the actual and potential adverse effects of this discharge on air quality; and*
 - ii. *An assessment of the proposed discharge against any relevant objectives and policies of the relevant statutory documents.*
2. SOL Quarries Ltd propose using a maximum of two (2) screening and crushing plants. Each screening and crushing plant comprises:
 - a. 1 x Cone Crusher.
 - b. 1 x Powerscreen.
 - c. 1 x Jaw Crusher.



3. The screening and crushing plant components are sequenced based on the size of the raw product (Quarry gravel) and the specification of the finished aggregate product.
4. All the crushing and screening plant components are powered by self-contained internal combustion diesel engines – **not** generators. As no generator will be used, an assessment of the effects associated with discharges from the internal combustion diesel engines against the Objectives, Policies and Rules of the CARP has not been provided.

Cleanfilling Rule Assessment

The discharge of contaminants into air from cleanfilling has been assessed under Rule 7.49 of the CARP as a permitted activity. However, insufficient information has been provided to demonstrate how compliance with all the conditions is achieved. Please provide:

- a. *An amended rule assessment demonstrating how the activity is to comply with the conditions of Rule 7.49 of the CARP.*
5. An updated assessment against Rule 7.49 is provided in the table below.

RULE	COMPLIANCE ASSESSMENT	STATUS
Section 7 – Rules		
Waste management and disposal		
Rule 7.49	<p>The discharge of contaminants into air from the disposal of cleanfill is a permitted activity provided the following conditions are met:</p> <ol style="list-style-type: none"> 1. The discharge of dust does not cause an offensive or objectionable effect beyond the boundary of the property of origin when assessed in accordance with Schedule 2; and 2. The discharge does not occur within 200m of a sensitive activity on another property, or within 100m of a wāhi tapu, wāhi taonga or place of significance to Ngāi Tahu that is identified in an Iwi Management Plan; and 3. The amount of material stored does not exceed 1000t when it has an average particle size of less than 3.5mm; and 4. If there is a discharge of dust beyond the boundary of the property of origin, a dust management plan is prepared in accordance with Schedule 2 and implemented by the person responsible for the discharge into air; and 5. The dust management plan is supplied to the CRC on request. <p>Comment – <i>the proposal includes the disposal of cleanfill which will be utilised to establish a base for recontouring the Quarry prior to final rehabilitation (a layer of topsoil</i></p>	<p>Does not comply</p> <p><i>A portion of the proposed quarry extension and clean filling will be located within 200 m of the area within 20 metres of the façade of the existing occupied dwelling at 93 Conservators Road (Lot 1 DP 82891).</i></p> <p><i>Accordingly, the discharge will be occurring within 200 m of a “sensitive activity”.</i></p>



and grassing). It is proposed that the deposition of cleanfill and rehabilitation will be undertaken progressively across the site from West to East. The cleanfill operation will be undertaken in accordance with the Cleanfill Licence held by SOL which is renewed annually with Christchurch City Council, and in accordance with the proposed resource consents from Environment Canterbury and Christchurch City Council related to the discharge of contaminants to ground and the deposition of material to land over an unconfined or semi-confined aquifer.

- 1. The air quality reports prepared by NZ Air and PDP conclude that there will be no offensive or objectionable effect beyond the boundary of the site. Both reports undertook assessments against the FIDOL factors outlined in Schedule 2.*
- 2. The CARP defines a sensitive activity as
“... an activity undertaken in:
 - a. the area within 20m of the façade of an occupied dwelling; or*
 - b. a residential area or zone as defined in a district plan; or*
 - c. a public amenity area, including those parts of any building and associated outdoor areas normally available for use by the general public, excluding any areas used for services or access areas; or*
 - d. a place, outside of the Coastal Marine Area, of public assembly for recreation, education, worship, culture or deliberation purposes.”**

A portion of the proposed quarry extension and clean filling will be located within 200 m of the area within 20 metres of the façade of the existing occupied dwelling at 93 Conservators Road (Lot 1 DP 82891) – Condition 2(a). Accordingly, the discharge will be occurring within 200 m of a sensitive activity.

- 3. Based on the cleanfill accepted at the existing SOL Quarry, the cleanfill will not exceed 1000t with an average particle size of less than 3.5 mm.*
- 4. There will not be a discharge beyond the boundary of the application site. A draft Dust Management Plan will be prepared prior to any site works being undertaken and will address the discharge of fugitive dust from the site and outline the mitigation measures that will be undertaken.*



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5. *The draft Dust Management Plan will be updated dependant on potential conditions of consent prior to any site working being undertaken. This will be provided to ECan on request.*
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Rule 7.63	The discharge of contaminants into air:	Discretionary Activity
	<ol style="list-style-type: none">1. that does not comply with one or more of the conditions of Rules 7.47 to 7.62, excluding condition 1 of Rules 7.47, 7.48, 7.49, 7.50 7.51, 7.55, 7.59 and 7.62; or2. that is from an industrial or trade premise and is not managed by Rules 7.47 -7.62;	
	and is not a prohibited activity, is a discretionary activity.	
	<p>Comment – <i>during the final stages of the cleanfill (approximately 6 – 12 months) the proposed discharge of contaminants to air associated with the cleanfill operation will occur within 200 m of a sensitive activity as defined in the CARP.</i></p> <p><i>Accordingly, the discharge is considered to be a discretionary activity pursuant to Rule 7.63.</i></p>	

6. The proposed cleanfilling activity will be undertaken at the site in association with the operation of the quarry. The proposed cleanfill material will be inert and will not emit a noxious or offensive odour beyond the boundary of the Quarry property. The cleanfill material will be used as a base for rehabilitation and re-contouring the property.
7. During the last 6 – 12 months of the Quarry operation the disposal and compaction of cleanfill material will occur within 200 m of a *sensitive activity*, specifically within 200 m of the curtilage area of the property at 93 Conservators Road, Yaldhurst.
8. Accordingly, a resource consent is required for the disposal of cleanfill during the last 6 – 12 months of the Quarry and cleanfill operation, and is deemed to be a *discretionary activity*.
9. Dust management is considered a critical operational requirement for a quarry. The applicant will prepare a comprehensive Dust Management Plan that will be implemented under the umbrella of a Quarry Management Plan. The Dust Management Plan will outline a suite of measures to control dust from the operation of the quarry and the cleanfill. The Dust Management Plan will be provided to Environment Canterbury and Christchurch City Council for certification prior to any works being undertaken, including enabling works. A summary of the proposed mitigation is provided below.
 - A maximum of nine hectares will be exposed for excavation at any one time.
 - During enabling works, the applicant will install and commission an automated dust suppression sprinkler system. This system will provide dust suppression in conditions which would otherwise



result in fugitive dust. The automated dust suppression system will be triggered by the PM₁₀ dust monitor.

- The internal heavy vehicle haul road has been sealed and will be maintained for its full length.
 - Cleanfill sourced from off-site will be limited to inert material defined as being acceptable cleanfill material, in accordance with the Ministry for the Environment *A Guide to Managing Cleanfills: 2002*. Cleanfill material will not include plaster board, hydro-excavated waste, treated timber, general construction and demolition waste, infectious, or any other leachable materials, or any materials capable of producing an offensive or objectionable odour.
10. It is noted that the owners and occupiers of the property at 93 Conservators Road (Lot 1 DP 82891) have provided formal written approval regarding the quarry and cleanfill operations. As such, any effects resulting from the activity must be disregarded.
11. In considering there is no actual potential for the discharge of contaminants associated with the cleanfill beyond the boundary of the Quarry property, and the brief duration of the cleanfill operation within 200 m of the curtilage area of the dwelling at 93 Conservators Road, Yaldhurst, we have concluded that the potential effects are **less than minor**.

Assessment of Activity against the National Environmental Standards Freshwater (NES-F) 2020

The NES-F (2020) came into effect on 3 September 2020 and is a matter that the decision maker must also have regard to. The NES-F 2020 sets requirements for carrying out certain activities that pose risks to freshwater and freshwater ecosystems. Anyone carrying out these activities will need to comply with these standards. Please provide:

- a. *A discussion as to whether the NES-F 2020 is relevant to this application, with particular regard to the regulations relating to fish passage and the re-alignment of the water race; and*
- b. *If determined to be relevant in accordance with (2)(a), please provide an assessment against any relevant standards set out in the NES-F 2020 and if the application meets the permitted activity standard, please provide an explanation of how.*

Where it has been identified that an activity requires consent under the NES-F 2020, the additional consent(s) may be requested under s91 of the RMA.

12. The National Environmental Standards Freshwater 2020 (NES-F 2020) does not contain objectives or policies; rather the NES-F 2020 includes *Rules* either permitting or requiring a resource consent for certain activities.
13. This assessment considers the proposed quarry extension and requisite 'enabling works' in terms of Schedule 4(3)(a) "permitted activities" and Schedule 4(2)(1)(e) 'activities requiring a resource consent'.
14. As detailed in the AEE and supporting documentation, the proposed quarry extension, including the requisite 'enabling works' will be undertaken in a manner that ensures water quality is not adversely affected. The extraction of quarry gravels, the disposal of cleanfill and the realignment of the Paparua



Stockwater Race will be undertaken in a manner which will not affect groundwater quality, surface water quality or fish passage.

15. The site is not located in proximity to a Drinking Water Protection Zone and will not impact surrounding bore users' abilities to draw potable water for their use.
16. In terms of the NES-F 2020, of potential relevance to the proposed quarry extension is the potential for realignment of the Paparua Stockwater Race to affect fish passage.
17. The Paparua Stockwater Race bisects the proposed Quarry extension from west to east. The stockwater race is owned and operated by Selwyn District Council (SDC). It is proposed to relocate the stockwater race to the northern and eastern site boundaries. The realignment of the stockwater race will be undertaken in accordance with a methodology described by Aquatic Ecology Ltd, specialists in aquatic ecology. In summary, the methodology will involve:
 - The location of the new channel will be surveyed, and the position confirmed with SDC.
 - The new channel will be formed using an excavator.
 - The form of the excavated new channel will be checked for location, depth and elevation, ensuring the same fall as the existing stockwater race.
 - SDC and an aquatic ecologist will inspect the new channel.
 - Prior to breaching the tail and head of the channel and prior to allowing water to flow in the new channel, a suitably qualified aquatic ecologist will "electric fish" the existing stockwater race and will relocate any aquatic species captured downstream.
 - Once the new channel has been completed the tail of the new channel will be breached, followed by the head of the new channel, allowing water to flow.
 - The old stockwater alignment will be capped, at both the head and tail, to ensure there is no flow once the re-aligned stockwater race is fully functioning.
18. The full realignment methodology is detailed in the Ecology Report¹.
19. Subpart 3 of the NES-F 2020 addresses the effects of activities on the passage of fish relating to *the placement, use, alteration, extension, or reconstruction of any culvert, weir, flap gate, dam or ford in, on, over, or under the bed of any river or connected area*. At no point will the passage of fish be impacted by the realignment of the stockwater race and none of the structures listed in Subpart 3 (a) – (e) will be installed in the stockwater race.

Based on the assessment above, the provisions of the NES-F 2020 have been considered and it has been determined that none are relevant to the proposal.

¹ Assessment of Environmental Effects; Paparua Stockwater Race (PSR) Diversion. AEL Report No 172. May 2019.



Canterbury Regional Policy Statement

An assessment of some of the relevant objectives and policies of the Canterbury Regional Policy Statement has been provided. This has focused on Chapter 5 (Land Use and Infrastructure) and Chapter 14 (Air Quality).

a. Please provide an assessment of Chapter 7 (Fresh Water) or Chapter 17 (Contaminated Land).

21. The Canterbury Regional Policy Statement (CRPS) provides an overview of the resource management issues of Canterbury. It sets out how natural and physical resources are to be managed in an integrated way with the aim of sustainable management. This means providing for the needs of current and future generations, while aiming to improve the quality of the environment.
22. An assessment against the relevant Objectives and Policies of Chapter 7 and Chapter 17 is provided in the Table below.
23. With respect to Chapter 17 (Contaminated Land) we would note that the proposed Quarry extension comprises the subdivided portions of 2 properties (93 Conservators Road and 133 Conservators Road, Yaldhurst). While the proposed Quarry land formerly comprising a portion of 133 Conservators Road, Yaldhurst is not identified on the ECan Listed Land Use Register (LLUR) as a contaminated site, the subdivided portion of 93 Conservators Road, Yaldhurst is identified as potentially contaminated.
24. Accordingly, Pattle Delamore Partners Ltd (PDP) was engaged to prepare a Preliminary Site Investigation (PSI). The PSI provides a basis for identifying areas which will be subjected to a Detailed Site Investigation (DSI), including soil sampling, prior to quarrying.
25. The areas identified relate, primarily, to asbestos clad buildings on-site and uncertainty regarding depressions in the landform. The remediation, investigation and managing the identified or any encountered soil contamination during the proposed future quarrying operations is proposed to be coordinated through a Site Management Plan. A copy of the PSI Report is attached to this response.

Reference	Objective / Policy	Comment
Chapter 7: Freshwater		
Objective 7.2.1 Sustainable management of fresh water	<p>The region's fresh water resources are sustainably managed to enable people and communities to provide for their economic and social well-being through abstracting and/or using water for irrigation, hydro-electricity generation and other economic activities, and for recreational and amenity values, and any economic and social activities associated with those values, providing:</p> <ol style="list-style-type: none"> 1. the life-supporting capacity ecosystem processes, and indigenous species and their associated freshwater ecosystems and mauri of the fresh water is safe guarded; 	<p>The application site is located within the Christchurch Groundwater Protection Zone. This zone recognises that the Christchurch Groundwater System is highly valued and also highly susceptible to contamination. Groundwater in Zone 1 is particularly vulnerable to adverse effects arising from contamination as a result of land use activities because it is relatively near the surface and the gravel is very permeable. Maintaining the quality of groundwater in this zone will ensure a continued supply of high-quality water to the aquifer system so that it remains suitable for a range of uses.</p>



	<ol style="list-style-type: none"> 2. the natural character values of wetlands, lakes and rivers and their margins are preserved, and these areas are protected from inappropriate subdivision, use and development and where appropriate restored or enhanced; and 3. any actual or reasonably foreseeable requirements for community and stockwater supplies and customary uses, are provided for. 	<p>The proposed Quarry extension, stockwater race relocation and the cleanfill operations, including the Site rehabilitation, have the potential to adversely affect groundwater through the storage of hazardous substances, the excavation works above an unconfined aquifer and the placement of cleanfill material on land above an unconfined aquifer.</p> <p>Hazardous materials will be stored in an appropriate facility to contain any leaks or spills. This will reduce the risk of any uncontrolled discharge of hazardous substances to ground and the percolation to groundwater.</p>
<p>Objective 7.2.4 Integrated management of freshwater resources</p>	<p>Fresh water is sustainably managed in an integrated way within and across catchments, between activities, and between agencies and people with interests in water management in the community, considering:</p> <ol style="list-style-type: none"> 1. the Ngāi Tahu ethic of Ki Uta Ki Tai (from the mountains to the sea); 2. the interconnectivity of surface water and groundwater; 3. the effects of land uses and intensification of land uses on demand for water and on water quality; and 4. kaitiakitanga and the ethic of stewardship; and 5. any net benefits of using water, and water infrastructure, and the significance of those benefits to the Canterbury region. 	<p>With respect to the Paparua Stockwater Race realignment. The Ecological Report prepared in May 2019 assessed the ecological values associated with the water race and assess the impact from the proposed diversion. The results from the ecological survey indicated that the Paparua Stockwater Race has low ecological value. The stockwater race cannot be described as being that of high natural character.</p> <p>The potential effects associated with the disposal of cleanfill over an unconfined aquifer are the contamination of groundwater through the leaching of contaminants. The mitigations proposed by the applicant include identifying the origin of all cleanfill before accepting it on-site and retaining at least 1-metre of undisturbed soils between the base of the Quarry Pit (the deepest potential cleanfill) and the highest recorded groundwater level. Regular monitoring will also be undertaken as detailed in the AEE and supporting documentation.</p>
<p>Policy 7.3.1 Adverse effects of activities on the natural character of freshwater</p>	<p>To identify the natural character values of freshwater bodies and their margins in the region and to:</p> <ol style="list-style-type: none"> 1. preserve natural character values where there is a high state of natural character; 2. maintain natural character values where they are modified but highly valued; and 3. improve natural character values where they have been degraded to unacceptable levels; <p>unless modification of the natural character values of a freshwater body is provided for as part of an integrated solution to water management in a catchment in accordance with Policy 7.3.9, which addresses remedying and mitigating adverse effects on the environment and its natural character values.</p>	<p>Overall, based on the overview of mitigation described above, within the consent application and the proposed conditions of consent the proposal is consistent with the relevant objectives and policies in Chapter 7.</p>



Chapter 17 – Contaminated Land

Objective 17.2.1 Protection from adverse effects of contaminated land	Protection of people and the environment from both on-site and off-site adverse effects of contaminated land.	A portion of the Site is identified on the Listed Land Use Register (LLUR) – the subdivided portion of 93 Conservators Road, Yaldhurst. Accordingly, PDP was commissioned to undertake a Preliminary Site Investigation (PSI), which identified areas of potential interest with respect to Site contamination. These areas will be subjected to a Detailed Site Investigation (DSI) prior to quarrying activities in the identified areas. The DSI and a Site Management Plan are considered appropriate to meet the requirements of Objective 17.2.1.
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26. An assessment of the proposed Quarry extension has concluded that it is **consistent** with the objectives and policies identified above and the overarching direction of the CRPS.

Assessment against the Provisions of the National Policy Statement for Freshwater Management 2020 (NPSFM 2020)

The NPSFM 2020 came into effect on 3 September 2020 and though an assessment was not required when the application was lodged, the NPSFM 2020 is a matter the decision maker must have regard to. The NPSFM 2020 postdates all of the Environment Canterbury's plans and carries considerable weight in consent decision making as a later in time piece of national direction. This means that applications are now required to provide a robust consideration of the provisions of the NPSFM 2020. Therefore, please provide an assessment of the activity against the objectives and policies of the NPSFM 2020 including:

- a. An assessment against the hierarchy of obligations outlined in the NPSFM 2020 objective; and*
- b. An assessment of how freshwater will be managed in accordance with the concept of Te Mana o Te Wai (Policy one); and*
- c. An assessment against any of the relevant implantation provisions in Part 3 of the NPSFM 2020.*

We acknowledge this may be difficult as the 'local approach to Te Mana o Te Wai' is yet to be developed; however, careful consideration of the relevant Iwi Management Plan(s) will be useful in determining how particular NPSFM 2020 policies should be applied in any given situation.

Please ensure the assessment against the NPS-FM discusses the proposed gravel extraction, the cleanfilling activity and the discharge of contaminants into and onto land where they may enter groundwater.

27. The NPS-FM 2020 provides a long-term framework for achieving improvements in freshwater quality. The fundamental concept of the NPS-FM 2020 is Te Mana o te Wai. Consistent with that fundamental concept, the objective of the NPSD-FM is to firstly prioritise the health and well-being of water bodies



and freshwater ecosystem health, secondly prioritise human health needs, and then thirdly prioritise the ability of people and communities to provide for their own social, economic and cultural wellbeing.

28. Regional councils including ECan, will be required to implement the NPSD-FM 2020 through the notification of freshwater planning instruments by 31 December 2024, with the final recommendations report from a Freshwater Hearings Panel due no later than 31 December 2026.
29. The following provides an assessment of the proposal against the relevant objectives and policies contained in the NPS-FM 2020.

2.1 Objective (1) - The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:

- (a) first, the health and well-being of water bodies and freshwater ecosystems*
- (b) second, the health needs of people (such as drinking water)*
- (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.*

Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai.

Policy 2: Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for.

Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.

30. Objective 1 seeks to protect the health and wellbeing of freshwater and its users without adversely affecting the ability for people and communities to provide for their wellbeing.
31. The proposed quarry extension includes the use of freshwater for dust suppression and the realignment of a stockwater race. It also includes gravel extraction, cleanfilling activities and the discharge of contaminants into and onto land where they may enter groundwater. All of these activities may have the potential to adversely affect groundwater quality or surface water quality if they are not managed correctly.
32. The proposal will be subject to a number of consent conditions specifically designed to protect freshwater from potential degradation This includes measures such as ensuring at least 1-metre of separation between the base of the Quarry Pit and groundwater. The separation distance will be measured and recorded every 14 days over winter (June to September) and monthly for the remainder of the year. In addition, groundwater samples will be drawn and assessed by an independent laboratory with respect to groundwater quality on a monthly basis.
33. Groundwater information will be provided to ECan on request.
34. The concept underpinning the NPS-FM 2020 is the six principles of Te Mana o te Wai and this is identified in Policy 1. The local approach to managing Te Mana o te Wai has not been developed. As such, in the interim, it is considered appropriate to assess the proposal against the Mahaanui Iwi Management Plan (2013). The assessment is provided in the table below, confirming the proposed activity is consistent with the issues and policies identified by tangata whenua iwi.



Issue / Policy	Comment
<i>Ranginui</i>	
<p>R1.1 To protect the mauri of air from adverse effects associated with discharge to air activities.</p>	<p>The expert evidence has concluded that discharges to air will be contained within the boundary of the Quarry Site. Given the location of the proposal and the surrounding land use, which are primarily agricultural in nature, the activity will not result in adverse effects on the mauri of the air. The mitigation measures proposed, including the construction of a bund, the installation and operation of an automated dust suppression system and the implementation of a Dust Management Plan will appropriately mitigate any effects.</p>
<p>R1.2 To require that the regional council recognise and provide for the relationship of Ngāi Tahu with air, and the specific cultural considerations for air quality, including the effects of discharge to air activities on sites and resources of significance to tāngata whenua and the protection of cultural amenity values.</p>	<p>There are no known sites of cultural significance on the proposed area.</p>
<p>R1.4 To support the use of indigenous plantings and restoration projects as a means to offset and mitigate industrial, agricultural and residential discharges to air.</p>	<p>The proposal includes Site rehabilitation, ensuring the Quarry is infilled and grassed, in order to be returned to productive agricultural pastureland. SOL Quarries Ltd will mitigate fugitive dust through maintaining vegetation cover on the bunds and unconsolidated areas that are not being quarried.</p>
<i>Wai Māori</i>	
<p>WM6.17 To require the development of stringent and enforceable controls on the following activities given the risk to water quality:</p> <p>(a) ..</p> <p>(d) Activities in the bed and margins of waterways, including gravel extraction; and</p> <p>(e) ..</p>	<p>Although there are no known wāhi tapu or wāhi taonga in the area, SOL Quarries Ltd proposes to volunteer an accidental discovery protocol.</p>
<p>P11.1 To assess proposals for earthworks with particular regard to:</p> <p>(a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;</p> <p>(b) Potential effects on waterways, wetlands and waipuna;</p> <p>(c) Potential effects on indigenous biodiversity;</p> <p>(d) Potential effects on natural landforms and features, including ridge lines;</p>	<p>The stockwater race, which is proposed to be realigned as part of the ‘enabling works’, is an artificial waterbody. While it is recognised that the stockwater race is maintained through the regular (6-monthly) excavation of silts, it may still form a habitat for aquatic life. The proposed realignment methodology will avoid any potential adverse effects.</p>



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- (e) Proposed erosion and sediment control measures; and
 - (f) Rehabilitation and remediation plan following earthworks.
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P11.9 To require stringent and enforceable controls on land use and earthworks activities as part of the resource consent process, to protect waterways and waterbodies from sedimentation, including but not limited to:

- (a) The use of buffer zones;
- (b) Minimising the extent of land cleared and left bare at any given time; and
- (c) Capture of run-off, and sediment control.

The re-alignment of the stock water race will be undertaken in accordance with the Selwyn District Council Engineering Standard WR8.0 and agreed Conditions of Consents.

The methodology proposed to realign the stockwater race, combined with the engineering and environmental controls will ensure any potential adverse effects are mitigated.

CL1.3 To work with local authorities to increase awareness and knowledge of the use of cultural landscapes as a tāngata whenua planning tool.

The proposed area is not within a mapped cultural landscape or silent file area.

- 35. The Site is not located in proximity to a Drinking Water Protection Zone and will not impact surrounding bore users' abilities to draw water for their use.
- 36. The proposed Quarry extension will enable people and communities to provide for their social, economic and well-being by contributing to the roading, infrastructure, residential development and the on-going earthquake rebuild in the Christchurch and wider Canterbury area.
- 37. Overall, the proposal has been assessed to be **consistent** with the relevant issues and policies of the Mahaanui Iwi Management Plan as well as the NPS-FM 2020.
- 38. We trust this information sufficiently addresses the matters set out in Council's request for further information. However, please do not hesitate to contact me should you require further clarification of any matter(s).

Yours sincerely

Elrick & Co Limited

Simon Hedley

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